

<b>Change Number</b> M-020-02-01	<b>Federal Facility Agreement and Consent Order Change Control Form</b> <b>Do not use blue ink. Type or print using black ink.</b>		<b>Date</b> 2/11/2002
<b>Originator</b> P. M. Knollmeyer, RL Assistant Manager Central Plateau		<b>Phone</b> 376-7435	
<b>Class of Change</b> <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II – Executive Manager <input type="checkbox"/> III - Project Manager			
<b>Change Title</b> Modify Tri-Party Agreement Milestone Series M-020 in Accordance with the Central Plateau Agreement In Principle			
<b>Description/Justification of Change</b>  <p>The Hanford Federal Facility Agreement and Consent Order (TPA) contains commitments for the U.S. Department of Energy (USDOE) to submit the 200 Area National Priority List (NPL) Remedial Investigation/Feasibility Study (RI/FS) Work Plans to complete the Investigation of Past-Practice Units by December 31, 2005 (Tri-Party Agreement Milestone M-013); complete all 200 Area Non-Tank Farm pre-Record of Decision (ROD) site investigations under approved work plan schedules by December 31, 2008 (Tri-Party Agreement Major Milestone M-015-00C); complete the remedial actions for all non-Tank Farm Operable Units by September 30, 2018 (Tri-Party Agreement Milestone M-016-00); and Submit Part B Permit Applications or Closure/Post Closure Plans for all Resource Conservation and Recovery Act (RCRA) Treatment, Storage, and Disposal (TSD) units (M-020-00) by February 28, 2004.</p> <p>USDOE, the U.S. Environmental Protection Agency (EPA), and the State of Washington, Department of Ecology (Ecology) (parties) have completed negotiations to modify the schedule for completion of non-Tank Farm Remedial Investigations/Remedial Actions in the Central Plateau. These negotiations were conducted in accordance with the Tri-Party Agreement and the parties will provide the stakeholders/public the opportunity to review the proposed changes prior to approval. The parties have agreed to a strategy for timely waste site remediation of the non-Tank Farm RCRA corrective actions and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) past practice units for the Hanford Site Central Plateau. The agencies have set the schedule for submittal of the RCRA TSD Closure/Post Closure Plans (M-020 series milestones). The schedule is coordinated with the FS submittal date and activities (M-015 series milestones). The M-015 and M-020 series milestones, while coordinated, remain independently enforceable.</p> <p>The agencies signed an Agreement in Principle (AIP) that calls for the parties to complete negotiations and sign a Tentative Agreement by January 31, 2002, and commits the parties to complete public comment/review and agency approval no later than June 5, 2002.</p>			
<b>Continued on pages 2 through 3.</b>			
<b>Impact of Change</b> Extends completion date to coincide with the FS completion dates under M-015 and further defined the M-020 commitments through two additional milestones. Clarifications, consolidation and revisions of existing M-020 interim milestones.			
<b>Affected Documents</b> The Tri-Party Agreement Action Plan – Appendix D, as amended and Hanford site internal planning, management, and budget documents (e.g., USDOE and USDOE contractor Baseline Change Control documents; Multi-Year Work Plans; Sitewide Systems Engineering Control documents; Project Management Plans; and if appropriate, LDR requirements should the subject wastes be generated as a result of this modification).			
<b>Approvals</b>  <div> <div>_____</div> <div>_____</div> <div>_____</div> </div> <div> <div>K. A. Klein, RL Manager</div> <div>Date</div> <div>_____</div> </div> <div> <div>_____</div> <div>_____</div> <div>_____</div> </div> <div> <div>L. J. Iani, EPA Region 10 Administrator</div> <div>Date</div> <div>_____</div> </div> <div> <div>_____</div> <div>_____</div> <div>_____</div> </div> <div> <div>T. C. Fitzsimmons, Ecology Director</div> <div>Date</div> <div>_____</div> </div>			<div>_____</div> <div>_____</div> <div>_____</div>

The *200 Areas Remedial Investigation/Feasibility Study Implementation Plan – Environmental Restoration Program, DOE/RL-98-28, Rev. 0*, (Implementation Plan) established an approach for investigating 200 Area non-Tank Farm past-practice waste sites. Under this plan, approximately 700 waste sites were grouped into 23 process-based operable units (OUs), which in turn were grouped into 9 major waste categories (e.g., process waste, landfills). The 16 RCRA TSD Units requiring closure/post closure plans under the M-020 series milestone were included in OUs under this grouping process. All 23 OUs were scheduled in the Tri-Party Agreement to have work plans developed under the M-013 series milestone. All 16 RCRA TSDs were identified in the Implementation Plan as sites requiring investigation. At the current time, closure/post closure plans have been submitted for 7 of the 16 TSD Units.

The 16 RCRA TSD units are:

RCRA TSD	Existing M-020 Milestone Number	Submittal Status	Associated OU
600 NRDWL	M-20-07	Submitted 1/31/90	200-SW-2
216-B-3 Pond System	M-20-09	Submitted 3/31/90	200-CW-1
276-S-141 Storage Tank	M-20-27	Submitted 11/25/92	200-IS-1
276-S-142 Storage Tank	M-20-27	Submitted 11/25/92	200-IS-1
216-A-10 Crib	M-20-33	Not submitted	200-PW-2
216-A-36B Crib	M-20-33	Not submitted	200-PW-2
216-A-29 Ditch	M-20-36	Submitted 6/30/95	200-CS-1
216-U-12 Crib	M-20-37	Submitted 6/27/95	200-PW-2
216-A-37-1	M-20-52	Not submitted	200-PW-4
207-A South Ret. Basin	M-20-53	Not submitted	200-PW-4
216-B-63 Trench	M-20-36	Submitted 4/3/95	200-CS-1
216-S-10 Pond	M-20-39	Not submitted	200-CS-1
216-S-10 Ditch	M-20-39	Not submitted	200-CS-1
241-CX-70 Storage Tank	M-20-54	Not submitted	200-IS-1
241-CX-71 Neut. Tank	M-20-54	Not submitted	200-IS-1
241-CX-72 Storage Tank	M-20-54	Not submitted	200-IS-1

Subsequent to the approval of the Implementation Plan, one OU was included in the *100 Area Remaining Sites Record of Decision*. For the remaining operable units, the three agencies have adopted an improved approach to the remedial investigations and subsequent remediation of the waste sites based on lessons learned from Hanford's 100 and 300 Areas.

The revised investigation approach is to evaluate one or more OUs in a single RI/FS. This reduces the number of work plans, remedial investigation reports, and feasibility studies from 22 to 12. The revised approach is able to collect data necessary to adequately characterize the site and evaluate effective remedial alternatives. Under this approach, all of the RCRA TSDs identified in the M-020 series milestones will be sampled to comply with RCRA Closure/Post Closure requirements. These improvements will be incorporated into a revision of the *200 Areas Remedial Investigation/Feasibility Study Implementation Plan – Environmental Restoration Program, DOE/RL-98-28, Rev. 0*. Of the 12 RI/FS, 5 have approved work plans and 4 are in the final stages of the approval process. All completed work plans will be revised to reflect OU consolidation.

The Implementation Plan established a framework for integrating the RCRA TSD closure process with the OU RI/FS process. The remaining Closure/Post Closure plans will be submitted in conjunction with the associated operable unit Feasibility Study. The parties have proposed a change to the Tri-Party Agreement M-020-00 completion date to December 31, 2008 so that it will be

coordinated with the completion of the OU RI/FS process Tri-Party Agreement Milestone M-015-00C. The M-020 interim milestones are modified to coordinate with the M-015 interim milestones or with the remaining M-013 series milestones for OU work plans that have not yet been developed. The M-020 series milestones are independently enforceable. Milestone M-020-00B establishes the submittal date for closure/post closure plans for the following RCRA TSDs: 216-A-10, 216-A-36B, 216-A-37-1, 207-A South Retention Basin, 216-S-10 Pond, 216-S-10 Ditch, 241-CX-70, 241-CX-71, and 241-CX-72. Milestone M-020-00A was created to retain the February 28, 2004, deadline for submittal of Part B Permit Applications or Closure/Post Closure Plans for all RCRA TSD Units, except the units listed in M-020-00B.

Modifications/deletions to existing milestones are denoted with ~~redline/strike out~~, new milestones and changes are shaded.

M-20-00	Submit Part B Permit Applications or Closure/Post Closure Plans for All RCRA TSD Units	<del>2/28/2004</del> 12/31/2008
M-020-00A	Submit Part B Permit Applications or Closure/Post Closure Plans for all RCRA TSD Units except 216-A-10, 216-A-36B, 216-A-37-1, 207-A South Retention Basin, 216-S-10 Pond, 216-S-10 Ditch, 241-CX-70, 241-CX-71, and 241-CX-72.	02/28/2004
M-020-00B	Submit Closure/Post-Closure Plans for 216-A-10, 216-A-36B, 216-A-37-1, 207-A South Retention Basin, 216-S-10 Pond, 216-S-10 Ditch, 241-CX-70, 241-CX-71, and 241-CX-72.	12/31/2008
M-20-33	Submit 216-A-10 Crib, 216-A-36B Crib, 216-A-37-1 Crib, and 207-A South Retention Basin Closure/Post Closure Plans to Ecology in coordination with the <del>Work Plan for Uranium Rich Process Waste Group (to be coordinated with M-13-23)</del> Feasibility Study for the 200-PW-2 Uranium-Rich Process Waste Group Operable Unit (to be coordinated under M-15-43C)	<del>10/31/2003</del> 12/31/2005
M-20-39	Submit 216-S-10 Pond and Ditch Closure/Postclosure Plan to Ecology In coordination with the <del>Work Plans for the Chemical Sewer Group (To be Coordinated with M-13-21)</del> Feasibility Study for the 200-CS-1 Chemical Sewer Group Operable Unit (to be coordinated under M-15-39C)	<del>2/28/2003</del> 11/30/2005
M-20-52	Submit 216-A-37-1 Crib Closure/Postclosure Plan to Ecology in Coordination with the <del>Work Plan for the General Process Waste Group (to be coordinated with M-13-24)</del>	<del>12/31/2003</del>
M-20-53	Submit 207-A Retention Basin Closure/Postclosure Plan to Ecology in Coordination with the <del>Work Plan for the General Process Waste Group (to be coordinated with M-13-24)</del>	<del>12/31/2003</del>
M-20-54	Submit 241-CX-70 Storage Tank, 241-CX-71 Neutralization Tank, 241-CX-72 Storage Tank <del>Tank System</del> Closure/Post Closure Plan to Ecology in coordination with the <del>Work Plans for the Infrastructure Waste Group (To be coordinated with M-13-00K)</del> the 200-IS-1 Tanks/Lines/Pits/Boxes Operable Unit Work Plan Feasibility Study scheduled under M-13-00M	<del>2/28/2004</del> 12/31/2008